

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

BRENDA LERMA, INDIVIDUALLY,
AS NEXT FRIEND OF J.L. AND D.L.,
AND AS REPRESENTATIVE OF THE
ESTATE OF LUIS LERMA; FOR AND
ON BEHALF OF ALL THOSE
ENTITLED TO RECOVER FOR HIS
DEATH UNDER THE TEXAS
WRONGFUL DEATH AND
SURVIVAL ACTS

~~~~~

CIVIL ACTION NO.  
B12229

V.

## JURY DEMANDED

BRIGGS & STRATTON  
CORPORATION and BRIGGS &  
STRATTON POWER PRODUCTS  
GROUP, LLC

**DEFENDANTS BRIGGS & STRATTON CORPORATION AND  
BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC'S  
NOTICE OF ORAL/VIDEOTAPED DEPOSITION WITH  
SUBPOENA DUCES TECUM OF ROGER OWENS**

TO: PLAINTIFFS, BY AND THROUGH THEIR ATTORNEYS OF RECORD,  
STUART R. WHITE and CRAIG SICO, SICO, WHITE, HOELSCHER, HARRIS  
& BRAUGH, L.L.P., 900 FROST BANK PLAZA, 802 CARANCAHUA,  
CORPUS CHRISTI, TX 78401

PLEASE TAKE NOTICE that pursuant to Rule 30, Federal Rules of Civil Procedure, the undersigned attorney intends to take the oral/videotaped deposition of Roger Owens, at 10:00 a.m., on January 10, 2014, and continuing from day to day thereafter, at the offices of Hartline Dacus Barger Dreyer LLP, 3600 One Houston Center, 1221 McKinney Street, Houston, Texas 77010-2009 before a representative from Datascope Marquis Litigation Services, L.L.C., 7322 Southwest Freeway #1802, Houston, Texas, for the purposes of giving his deposition in the above-styled and

numbered cause of action, which deposition, when taken, may be used in evidence at the trial of this case. All parties are invited to attend and cross-examine.

Please take further notice that this document shall also serve as a Subpoena Duces Tecum to the deponent requiring him to produce the documents as listed on the attached Exhibit "A".

A list of all parties or attorneys for parties on whom this notice is being served is shown on the accompanying Certificate of Service.

Respectfully submitted,

By: /s/ Michael G. Terry

Michael G. Terry  
Attorney-in-Charge  
State Bar No. 19799800  
Federal Bar No. 926  
800 N. Shoreline Blvd.  
Suite 2000 B North Tower  
Corpus Christi, Texas 78401  
(361) 866-8000 - Telephone  
(361) 866-8039 - Facsimile

OF COUNSEL:

HARTLINE DACUS BARGER DREYER LLP  
800 N. Shoreline Blvd.  
Suite 2000 North Tower  
Corpus Christi, Texas 78401  
(361) 866-8000 - Telephone  
(361) 866-8039 - Facsimile

**ATTORNEYS FOR DEFENDANTS,  
BRIGGS & STRATTON CORPORATION AND  
BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel of record by the method indicated below on this the 7th day of January, 2014.

/s/ Michael G. Terry  
MICHAEL G. TERRY

VIA ELECTROINC AND FACSIMILE: (361) 653-3333

Mr. Stuart R. White  
Sico, White, Hoelscher, Harris & Braugh, L.L.P.  
900 Frost Bank Plaza  
802 N. Carancahua  
Corpus Christi, TX 78401

VIA FACSIMILE: (713) 688-9305

Datascope Marquis Litigation Services, L.L.C.  
7322 Southwest Fwy #1802  
Houston, TX 77074

**EXHIBIT "A"**

1. Current resume or curriculum vitae.
2. All documents relied upon in forming any opinions that the deponent has reached in this matter.
3. All documents and/or file material provided to him for review in this case, or obtained through his own investigation.
4. All articles, abstracts, papers, speeches, texts, and publications of any kind which deponent has authored, presented or edited in any professional journal or given to or presented before any professional group concerning his area of expertise. In lieu of the actual materials, a list of such materials will suffice if such articles are published and generally available to the public.
5. All documents, writings, written or printed materials, including scientific articles, records or physical materials of any kind, which the deponent has examined in connection with his work on the case.
6. All documents, writings, written or printed materials, charts, maps, graphs, records or physical materials of any kind, which the deponent has prepared in connection with this case.
7. All documents reflecting deponent's billing for fees and costs in this case.